

**IN THE UNITED STATES DISTRICT COURT  
FOR THE EASTERN DISTRICT OF NORTH CAROLINA  
WESTERN DIVISION  
No. 5:19-cv-249-FL**

MATTHEW BRADLEY,	)	<b>DEFENDANT ANALYTICAL</b>
	)	<b>GRAMMAR, INC.'S APPENDIX</b>
Plaintiff,	)	<b>TO ITS SEPARATE STATEMENT OF</b>
v.	)	<b>FACTS AND RESPONSES TO</b>
	)	<b>PLAINTIFF'S STATEMENT</b>
ANALYTICAL GRAMMAR, INC.,	)	<b>PURSUANT TO LOCAL RULE 56.1(a)</b>
	)	
Defendant.	)	

Exhibit 1: Declaration of Dan Booth dated August 6, 2020

**IN THE UNITED STATES DISTRICT COURT  
FOR THE EASTERN DISTRICT OF NORTH CAROLINA  
WESTERN DIVISION  
No. 5:19-cv-249-FL**

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MATTHEW BRADLEY,

Plaintiff,

v.

ANALYTICAL GRAMMAR, INC.,

Defendant.

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**DECLARATION OF DAN BOOTH  
IN SUPPORT OF DEFENDANT  
ANALYTICAL GRAMMAR, INC.'S  
RESPONSE IN OPPOSITION TO  
PLAINTIFF MATTHEW BRADLEY'S  
MOTION FOR PARTIAL SUMMARY  
JUDGMENT**

I, Dan Booth, declare as follows.

1. I am an attorney licensed to practice in the commonwealth of Massachusetts and I have entered a notice of special appearance in the above-referenced action. ([DE 14](#).) I am the founder and principal of the law firm Dan Booth Law LLC and counsel of record for defendant Analytical Grammar, Inc. ("Analytical"). I submit this declaration in support of Analytical's response to Plaintiff Matthew Bradley's Motion for Partial Summary Judgment, and in further support of Analytical's Motion for Summary Judgment, and to place before the Court evidence relied upon by Analytical in its accompanying response and summary judgment motion.

2. Using PACER, I downloaded copies of the exhibits to this declaration from the publicly available docket of *In re Facebook, Inc. Consumer Privacy User Profile Litigation*, Case No. 3:18-md-02843 (VC), a case before the Honorable Vince Chhabria of the United States District Court for the Northern District of California.

3. Attached hereto as **Exhibit 1** is a true and correct copy of a Declaration of Michael Duffey in Support of Defendant Facebook, Inc.'s Motion to Dismiss Plaintiff's Consolidated Complaint, dated and filed November 2, 2018 in *In re Facebook*.

4. Attached hereto as **Exhibit 2** is a true and correct copy of a document filed as Exhibit 26 to that Declaration of Michael Duffey in *In re Facebook*.

5. Attached hereto as **Exhibit 3** is a true and correct copy of Pretrial Order No. 20 entered September 9, 2019 on *In re Facebook*. The Pretrial Order has been reported at 402 F. Supp. 3d. 767 (N.D. Cal. 2019).

6. Attached hereto as **Exhibit 4** is a true and correct copy of a document filed as Exhibit 48 to that Declaration of Michael Duffey in *In re Facebook*.

I declare under penalty of perjury that the foregoing is true and correct.

Executed this 6th day of August in Concord, Massachusetts.

/s/ Dan Booth

Dan Booth